



State of Ohio Environmental Protection Agency

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November 29, 2001

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

RE: Comments - 3A/4A Excavation/OSDF Phase IV Construction Documents

Dear Mr. Reising:

Ohio EPA has reviewed DOE's October 9, 2001 submittal, "Area 3A/4A Excavation/On-Site Disposal Facility Phase IV Construction Documents." This submittal contained the following documents:

- OSDF Phase IV Construction Drawings, Revision 0
- Area 3A/4A Excavation Construction Drawings, Revision 0
- OSDF Phase IV Technical Specifications, Revision 0
- Area 3A/4A Excavation Technical Specifications, Revision 0
- OSDF Phase IV Final Support Plans
- OSDF Phase IV Revised Final Calculation Package, Revision 0, Volume VI of VI

Attached are Ohio EPA comments on these documents.

If there are any questions, please contact Michelle Waller or me at (937) 285-6466.

Sincerely,

for
Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Francis Hodge, Tetrattech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans

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**Ohio EPA Comments on the Area 3A/4A
Excavation Technical Specifications, Revision 0**

1. Commenting Organization: OEPA Commentor: OFFO
Section #: 02206 Pg. #: 7 of 7 Line #: 3.5 A Code: C
Original Comment #:
Comment: This line states "When the design surface has been achieved,
perform interim grading as follows.". Absolutely NO grading is to be done in the
excavations after design surface has been reached until certification sampling
has been performed. Please correct.

**Ohio EPA Comments on the OSDF Phase IV
Excavation Construction Drawings, Revision 0**

1. Commenting Organization: OEPA Commentor: OFFO
Drawing No.: 90X-6000-G-00330 Code: C
Original Comment #:
Comment: A. First, why is a new area being constructed instead of utilizing already existing areas? It would be much more in line with the sitewide goal of cleanup to reuse other areas then create a new one which will need to be removed in the future. Which areas were considered as possible alternatives to new construction and why were they excluded? At a minimum the area should be revised to avoid impact to wetlands in the proposed laydown area. Specifically the low lying area between the "goth tree" and the borrow area haul road.
B. Please show the proposed laydown area on a map which portrays the current topography of the area, i.e. a map detailing the current physical details of the old STP. - Additionally show how equipment would enter and exit the area.
C. Justify the size of the laydown area being proposed.
D. Provide details on the stormwater/runoff management of this area and how it will be managed in light of the current water level in the former STP excavation.

**Ohio EPA Comments on the OSDF Phase IV
Technical Specifications, Revision 0**

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 02930 Pg #: Tables 02930-1A and -1B Code: C
Comment: The two tables contain lists of seed mixtures that are appropriate for permanent vegetation in wet and dry areas. Neither of these tables accurately reflect the seed composition approved for the Cell 1 Cap. The permanent vegetation appropriate for the OSDF is not appropriate for areas undergoing restoration. Another Table should be created and titled "Seed mix for the OSDF Cap". The species mix should be the same as approved by Ohio EPA for the Cell 1 Cap.